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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

9 ERIC GILBERT,

10 Plaintiff,

11 v.

12 NORDSTROM, INC.; NAVY ACQUISITION
13 CO., INC.; NORSE HOLDINGS, INC.; ERIK
14 B. NORDSTROM; PETER E. NORDSTROM;
15 JAMES L. DONALD; KIRSTEN A. GREEN;
16 GLENDA G. MCNEAL; AMIE THUENER
17 O'TOOLE; GUY B. PERSAUD; ERIC D.
18 SPRUNK; BRADLEY D. TILDEN; MARK J.
19 TRITTON; ATTICUS N. TYSEN; EL
20 PUERTO DE LIVERPOOL S.A.B. DE C.V.,

21 Defendants.

Case No. 25-cv-00568-JHC

22 **STIPULATED MOTION TO FILE**
23 **OMNIBUS REPLY TO DEFENDANTS'**
24 **OPPOSITIONS TO MOTION FOR**
25 **PRELIMINARY INJUNCTION &**
26 **ORDER**

27 **NOTE ON MOTION CALENDAR:**
28 **April 28, 2025**

1 The parties file this stipulated motion pursuant to LCR 7(f) and 10(g).

2 On April 11, 2025, the Court issued an order on a briefing schedule on Plaintiff Eric
 3 Gilbert's motion for a preliminary injunction setting the deadline for Plaintiff to file its motion on
 4 April 18, 2025, for Defendants to respond by April 25, 2025, and Plaintiff to reply by April 29,
 5 2025. Dkt. 47. Plaintiff filed his motion on April 18, 2025. Dkt. 57 (Sealed), 58. On April 25,
 6 2025, Defendants Nordstrom, Inc. and the Independent Directors filed a brief in opposition
 7 (Dkt.65) to Plaintiff's motion, and the Buyer Defendants filed their own separate brief. Dkt. 70.

8 LCR 7(e)(3) permits Plaintiff to file a single 4,200 word brief in response to each of
 9 Defendants' oppositions. Plaintiff, however, believes one single omnibus brief, responding to both
 10 of the Defendants' briefs, would be more cohesive, understandable and efficient.

11 Accordingly, Plaintiff seeks this Court's permission to file one omnibus brief in response
 12 to the two oppositions filed by Defendants with no more than 8,400 words.

13 Defendants do not oppose Plaintiffs' request and therefore stipulate to this motion.

14
 15 DATED: April 28, 2025

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

Steve W. Berman, WSBA #12536

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

Email: steve@hbsslaw.com

Reed R. Kathrein

HAGENS BERMAN SOBOL SHAPIRO LLP

715 Hearst Avenue, Suite 300

Berkeley, CA 94710

Telephone: (510) 725-3000

Facsimile: (510) 725-3001

Email: reed@hbsslaw.com

s/ Jason Leviton

Jason Leviton, WSBA #34106 (*voluntarily inactive*)

BLOCK & LEVITON LLP

260 Franklin St. Suite 1860

Boston, MA 02110

Telephone: (617) 398-5600

Email: jason@blockleviton.com

Kimberly A. Evans

Lindsay K. Faccenda

Daniel M. Baker

BLOCK & LEVITON LLP

222 Delaware Avenue, Suite 1120

Wilmington, DE 19801

Telephone: (302) 499-3600

Email: kim@blockleviton.com

Email: lindsay@blockleviton.com

Email: daniel@blockleviton.com

Ned Weinberger

Michael C. Wagner

LABATON KELLER SUCHAROW LLP

222 Delaware Ave., Suite 1510

Wilmington, DE 19801

Telephone: (302) 573-2540

Email: nweinberger@labaton.com

mwagner@labaton.com

John Vielandi

LABATON KELLER SUCHAROW LLP

140 Broadway

New York, NY 10005

Telephone: (212) 907-0700

Email: jvielandi@labaton.com

Joel Fleming

Amanda Crawford

EQUITY LITIGATION GROUP LLP

1 Washington Mall #1307

Boston, MA 02108

(t) 617.468.8602

jfleming@equitylitigation.com

acrawford@equitylitigation.com

Jeremy S. Friedman

David F.E. Tejtzel

Alexander M. Krischik

FRIEDMAN OSTER & TEJTEL PLLC

493 Bedford Center Road, Suite 2D
Bedford Hills, NY 10507
Telephone: (888) 529-1108
Email: jfriedman@fotpllc.com
Email: dtejtel@fotpllc.com
Email: akrischik@fotpllc.com

Attorneys for Plaintiff

PERKINS COIE LLP

By s/ Sean C. Knowles

Sean C. Knowles, WSBA No. 39893
Joseph E. Bringman, WSBA No. 15236
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
E-mail: SKnowles@perkinscoie.com
E-mail: JBringman@perkinscoie.com

James W. Ducayet (admitted *pro hac vice*)

SIDLEY AUSTIN LLP

One South Dearborn
Chicago, IL 60603
Telephone: 312.853.7000
E-mail: JDucayet@sidley.com

Charlotte K. Newell (admitted *pro hac vice*)

SIDLEY AUSTIN LLP

787 Seventh Avenue
New York, NY 10019
Telephone: 212.839.5300
E-mail: CNewell@sidley.com

s/ Robin E. Wechkin

Robin E. Wechkin, WSBA No. 24756

SIDLEY AUSTIN LLP

8426 316th Pl SE
Issaquah, WA 98027-8767
Telephone: 415.439.1799
E-mail: rwechkin@sidley.com

*James L. Donald, Kirsten A. Green, Glenda G.
McNeal, Amie Thuener O'Toole, Guy B. Persaud,
Eric D. Sprunk, Bradley D. Tilden, Mark J. Tritton,
and Atticus N. Tysen*

DAVIS WRIGHT TREMAINE LLP

By s/Robert J. Maguire

Robert J. Maguire, WSBA #29909
Rachel H. Herd, WSBA #50339
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Tel: 206-622-3150
Fax: 206-757-7700
robmaguire@dwt.com
rachelherd@dwt.com

Daniel W. Halston (*pro hac vice*)

Robert K. Smith (*pro hac vice*)

**WILMER CUTLER PICKERING HALE AND DORR
LLP**

60 State Street Boston, MA 02109
Tel: 617-526-6000
Fax: 617-526-5000
daniel.halston@wilmerhale.com
robert.smith@wilmerhale.com

Tania C. Matsuoka (*pro hac vice*)

**WILMER CUTLER PICKERING HALE AND DORR
LLP**

7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel: 212-230-8800
Fax: 212-230-8888
tania.matsuoka@wilmerhale.com

*Attorneys for Defendants Navy Acquisition Co.
Inc., Norse Holdings, Inc., Erik B. Nordstrom, and
Peter E. Nordstrom*

Stephen P. Blake (*pro hac vice*)

Eric McCaffree (*pro hac vice*)

SIMPSON THACHER & BARTLETT LLP

2475 Hanover Street
Palo Alto, California 94304
Tel: (650) 251-5000
Fax: (650) 251-5002
sblake@stblaw.com
eric.mccaffree@stblaw.com

*Attorneys for Defendant El Puerto de Liverpool S.A.B.
de C.V.*

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF recipients.

DATED this 28th day of April, 2025.

s/ Steve W. Berman
Steve W. Berman

CERTIFICATE OF COMPLIANCE WITH WORD LIMIT

I hereby certify that this memorandum contains 173 words, excluding the caption, table of contents, table of authorities, signature blocks, and certificate of service, in compliance with the Local Civil Rules.

DATED this 18th day of April, 2025.

s/ Steve W. Berman
Steve W. Berman

ORDER

IT IS SO ORDERED.

DATED: April 28, 2025.

John H. Chun
JOHN H. CHUN
UNITED STATES DISTRICT JUDGE